

**Uintah Basin Electronic Telecommunications
d/b/a UBET Wireless
3843 South Highway 40
P.O. Box 157
Roosevelt, Utah 84066**

Marlene H. Dortch, Secretary
Federal Communications Commission
Washington, D.C. 20554

**Re: CC Docket No. 94-102,
Cellular Radiotelephone Service Station KNKN236,
Market No. 677(B2), Utah 5(B2) - Carbon RSA;
Broadband PCS Station KNLG530,
BTA No. 381, Rock Springs, WY BTA;
Broadband PCS Station WPQZ730,
BTA No. 168, Grand Junction, CO BTA;
Broadband PCS Station WPQZ731,
BTA No. 110, Denver, CO BTA; and
Broadband PCS Station WPSZ758,
BTA No. 399, Salt Lake City - Ogden, UT BTA;
Transmission of E-911 Calls from TTY Devices.**

Eleventh Quarterly Report

Dear Ms. Dortch:

This report is filed pursuant to the directive contained in the Commission's Fourth Report and Order (CC Docket No. 94-102), FCC 00-436, released December 14, 2000.

By way of background information, in our Fifth Quarterly Report we reported that, despite our best efforts, we would not be able to meet the Commission's June 30, 2002 deadline for providing service to digital TTY handsets. As noted therein, we were advised that our existing Nortel switch could not be upgraded to process digital TTY calls; and, accordingly, providing service to such handsets would require us to install a new switch. The Fifth Quarterly Report also noted that we had been unsuccessful in our efforts to obtain a price quote from Nortel for a new switch with digital TTY capability. The Fifth Quarterly Report further stated that we would be requesting a waiver of the requirement that we be able to process calls from digital TTY handsets by June 30, 2002.

As stated in our Sixth Quarterly Report, the waiver request was filed with the Commission on June 28, 2002 requesting a ten-month extension of time, up to and including April 30, 2003, within which to comply with the requirements of Section 20.18(c) of the Rules.

On April 29, 2003, we filed an amendment to the waiver request to request a compliance date of August 31, 2003 based upon the fact that Nortel had delivered the needed equipment, and that an installation schedule had been established. As stated in the April 29, 2003 filing, the installation of

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equipment is scheduled for completion on July 29, 2003 (See "Amendment to Petition for Limited Waiver of Section 20.18(c) of the Commission's Rules," filed April 29, 2003).

The installation of the equipment and software necessary to effect the "switch-split" was completed on July 29, 2003. Accordingly, the digital wireless portion of our network now is able to process calls from digital TTY handsets; and we are in full compliance with the requirements of Section 20.18(c) of the Rules.

Supplemental information is contained in the Addendum attached hereto.

Very truly yours,
Utah Basin Electronic
Telecommunications d/b/a
UBET Wireless

Dated: 10/13/03By: Bruce H. Todd

Bruce H. Todd,
General Manager

Attachment

Uintah Basin Electronic Telecommunications
d/b/a UBET Wireless
Addendum to Eleventh Quarterly Report, Filed October 2003

Development Activities

1. **Network Infrastructure Software Development** -- On June 28, 2002, the Filer filed with the Commission a waiver request for a ten-month extension of time, up to and including April 30, 2003, within which to comply with the requirements of Section 20.18(c) of the Rules. The waiver request was predicated on unavailability of equipment. On April 29, 2003, the Filer amended the waiver request to specify an August 31, 2003 compliance deadline. The amendment was based upon the fact that the necessary equipment had been delivered, and installation was scheduled for completion on July 29, 2003.

The TTY compatible software is in the MTX 10.0 software load provided by the Filer's switch vendor, Nortel. As explained in previous filings, this software was to be installed as part of the "switch-splitting" process pursuant to which the dual-load switch (providing switching services for the Filer's wireless operations and for the landline telephone operations of the Filer's parent corporation) is split and a new switch installed. Nortel no longer provides support services or software upgrades for the old dual-load switch, and apparently considers it an obsolete technology.

The installation of the equipment and software necessary to effect the "switch-split" was completed on July 29, 2003. Accordingly, the digital wireless portion of the Filer's network now is able to process calls from digital TTY handsets; and the Filer is in full compliance with the requirements of Section 20.18(c) of the Rules.

2. **Handset Development And Testing Plans** -- Handset vendors continue to work on the development of a TTY capable handset. To the extent (if any) necessary, the Filer will evaluate these units when they become available.

3. **Beta Testing And Lab Testing** -- The Filer is a small rural carrier, and looks to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, the Filer will test the equipment it procures as soon as practicable, with the goal of making sure it meets the manufacturer's specification.

4. **Release And General Availability To Carriers Of Network Infrastructure Software** -- The installation of the necessary equipment and software was completed on July 29, 2003.

5. **Availability To Carriers Of Full Digital Acceptance Test Units** -- Unknown at this time.

6. **Efforts Toward Achieving Digital Wireless Solution Compatibility With Enhanced TTY** -- The Filer's existing dual-load switch has been split and is now digital wireless TTY capable. The installation of the necessary equipment and software was completed on July 29, 2003.

Testing And Deployment Activities

7. **Carrier Coordination Of Testing With PSAP** -- The Filer will test with PSAPs in the areas where this service is deployed. Coordination with the PSAPs will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel.

8. **Carrier Testing Activities, Including Field Testing, Consumer End-to-End Testing, And Other Necessary Tests** -- All testing will be conducted in accordance with equipment vendor recommendations. Tests conducted to date show that the equipment and software works properly.

9. **Retail Availability Of Necessary Consumer Equipment** -- The Filer is unable to determine the general retail availability of consumer equipment.

10. **Geographic Scope Of Network Infrastructure Development** -- Since the Filer's network has only one switch, as equipment becomes available it will be deployed across the Filer's entire network.